

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION**

AMY DUCKWORTH,)
)
Plaintiff,)
) Case No.
v.)
)
MOTEL 6 d/b/a HARIOHM MOTA,)
LLC, HARISH (“MIKE”) PATEL, and)
ENTELLI CONSULTING, LLC,)
)

PETITION FOR REMOVAL

COME NOW Defendants, Hariohm Mota, LLC d/b/a Motel 6 (misidentified as Motel 6 d/b/a Hariohm Mota, LLC (“Motel 6”), Harish (“Mike”) Patel, and Entelli Consulting, LLC (“Entelli”) (collectively “Defendants”), by counsel, pursuant to 28 U.S.C. § 1446, and respectfully petition the Court as follows:

1. On February 16, 2018, an action was commenced against the Plaintiff, Amy Duckworth, in the Huntington Superior Court, entitled *Amy Duckworth v. Motel 6 d/b/a Hariohm Mota, LLC, Harish (“Mike”) Patel and Entelli Consulting, LLC*, Cause No. 35D01-1802-PL-000091 by the filing of a Complaint with said Court. A copy of the Complaint is attached hereto and incorporated herein as Exhibit “A”.

2. On or about March 5, 2018, Motel 6 and Patel received service of their respective Summons and a copy of the Complaint by certified mail.

3. On or about May 22, 2018, Entelli received service of Summons and a copy of the Complaint by process server.

4. The above-described action is a civil action of which this Court has original jurisdiction under the provisions of the Fair Labor Standards Act, 29 U.S.C. § 206(a)(1), and is one which may be removed to this Court by the Defendants.

5. Defendants have filed a Notice of Filing Petition for Removal contemporaneously herewith in the Allen County Superior Court.

WHEREFORE, Defendants, Hariohm Mota, LLC d/b/a Motel 6 (misidentified as Motel 6 d/b/a Hariohm Mota, LLC), Harish ("Mike") Patel, and Entelli Consulting, LLC pray that the action above now pending against Defendants in the Huntington Superior Court be removed therefrom to this Court forthwith, and for all other just and proper relief in the premises.

Respectfully submitted,

BARRETT MCNAGNY LLP

Dated: June 22, 2018

/s/ Rachel K. Steinhofer

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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of June 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notifications of such filing to the following:

Samuel L. Bolinger
803 South Calhoun Street, Suite 300
Fort Wayne, IN 46802

/s/ Rachel K. Steinhofer

Rachel K. Steinhofer